## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AEROGLOBAL CAPITAL MANAGEMENT, LLC., a Delaware Limited Liability Company,

Plaintiff.

C.A. NO. 02-CV-5311

v.

CIRRUS INDUSTRIES, INC., a Delaware Corporation, CIRRUS HOLDING COMPANY LIMITED, a Cayman Islands Corporation, CRESCENT CAPITAL INVESTMENTS, INC., a Delaware Corporation, FIRST ISLAMIC INVESTMENT BANK, E.C., a Bahrain Investment Bank, ALAN L. KLAPMEIER, DALE E. KLAPMEIER, PETER P. McDERMOTT, II, JOHN N. DYSLIN, SIMA GRIFFITH, MARWAN ATALLA, WILLIAM J. MIDON AND WILLIAM C. WOOD,

JURY TRIAL DEMANDED

Defendants.

## AFFIDAVIT OF WILLIAM KING

STATE OF MINNESOTA	)	
	)	ss:
COUNTY OF ST. LOUIS	)	

William King, being first duly sworn upon oath, states and alleges as follows:

- 1. I am the Vice President of Business Administration for Cirrus Industries, Inc. I have held this position since 1993. I am responsible for business development, growth, facilities, risk management and governmental affairs at Cirrus. I submit this affidavit based on my personal knowledge.
- 2. Cirrus Industries, Inc. is a privately-held Delaware corporation. It currently designs, manufactures, and markets general aviation composite aircraft. Cirrus' principal

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place of business is Duluth, Minnesota. Its only manufacturing plants are in Duluth, Minnesota and Grand Forks, North Dakota.

- Cirrus sells its products factory direct. All sales take place in Duluth, Minnesota. While Cirrus has sold airplanes to people from Pennsylvania it has not made any airplane sales in Pennsylvania. Cirrus has no regional sales managers located in Pennsylvania. On October 31, 2002 Cirrus hired an individual who lives in Denver, Pennsylvania, Lancaster County as its technical representative for the northeast region. This individual travels throughout the eastern seaboard north of North Carolina and provides service advice, warranty service and customer service to owners of Cirrus airplanes.
- Cirrus does not participate in any industry trade shows in Pennsylvania. Cirrus does not specifically target Pennsylvania or Pennsylvania residents in its advertising.
  - I have never been to Pennsylvania in my capacity as a Cirrus officer. FURTHER AFFIANT SAITH NOT.

Subscribed and sworn to before me day of November, 2002.